

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

Criminal No. 21-mj-30483

v.

Donald Deshazo,

Defendant.

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**MOTION AND BRIEF FOR LEAVE TO  
DISMISS COMPLAINT WITHOUT PREJUDICE**

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Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the United States of America hereby moves for leave to dismiss without prejudice the complaint against *Defendant* Donald Deshazo. In this case, the government needs additional time

- 1) to further develop the evidence sufficient to establish defendant's guilt beyond a reasonable doubt as to the entirety of the defendant's criminal conduct.

*See generally United States v. Lovasco*, 431 U.S. 783,790-96 (1977); 18 U.S.C. § 3161(d)(1). The government's ability to prosecute this case properly and completely would be substantially impaired were it required to proceed to indictment or information within the 30-day period prescribed by the Speedy Trial

Act, *see* 18 U.S.C. §§ 3161(b), 3161(h). Accordingly, the government requests leave to dismiss the complaint without prejudice.

Respectfully submitted,

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Acting United States Attorney

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Dated: November 3, 2021

CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, November 03, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

James W. Amberg

s/Timothy P. McDonald  
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